

**MEMO ENDORSED**

May 18, 2021

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VIA ECF

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *United States v. Michael Rose, 21 Cr 224 (VEC)*

Dear Judge Caproni:

We represent defendant Michael Rose in the above-captioned matter. With the consent of the government, we write to request an approximately 90-day adjournment of the status conference currently scheduled for May 20, 2021, at 10:30 a.m.

The reason for the request is to enable counsel to review the voluminous discovery materials and to continue conversations with the prosecutor about the charges.

In connection with this request, Mr. Rose and counsel agree to the exclusion of time under the Speedy Trial Act until the date set by the Court for the next conference.

Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ M. Theodore Takougang

M. Theodore Takougang

cc: AUSA Samuel Adelsberg (via ECF)

The May 20, 2021 status conference is ADJOURNED to **August 17, 2021, at 3:00 p.m.** The period of time between May 18, 2021, and August 17, 2021, is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), because the Court finds that the ends of justice served by accommodating logistical difficulties created by the COVID-19 pandemic and the complexity of this case due to voluminous discovery outweigh the interests of the public and the Defendant in a speedy trial.

SO ORDERED.

 5/18/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE